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12 *John Peterson*

13 **UNITED STATES DISTRICT COURT**  
14 **DISTRICT OF NEVADA**

15 JOHN PETERSON, individually,

16 Plaintiff,

17 vs.  
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19 UNITED FINANCIAL CASUALTY  
COMPANY; DOES I-V; and ROE  
20 CORPORATIONS VI-X, inclusive,

21 Defendants.  
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CASE NO.: 2:22-cv-1509-JCM-NJK

**STIPULATION AND ORDER TO  
EXTEND THE DEADLINE FOR  
PLAINTIFF TO FILE HIS  
RESPONSE TO DEFENDANT'S  
MOTION FOR SUMMARY  
JUDGMENT; MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT THEREOF (ECF No.  
40)**

**(First Request)**

23 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff JOHN  
24 PETERSON, through his counsel of record, Dennis M. Prince and Kevin T. Strong of  
25 PRINCE LAW GROUP and Craig W. Drummond and Liberty A. Pardee of  
26 DRUMMOND LAW FIRM, and Defendant UNITED FINANCIAL CASUALTY  
27 COMPANY, through its counsel of record, John T. Keating and Chatree M. Thongkham  
28 of KEATING LAW GROUP, that the deadline for Plaintiff to file his Response to



1 Defendant's Motion for Summary Judgment; Memorandum of Points and Authorities in  
2 Support Thereof (ECF No. 40), shall be extended by eighteen (18) days, up to and  
3 including Tuesday, January 18, 2023. Plaintiff's Response is currently due on Friday,  
4 December 29, 2023. Defendant filed its Motion for Summary Judgment on December 8,  
5 2023. This is the parties' first request for an extension of time allowing Plaintiff to file  
6 his Response. This Stipulation and Order is submitted in accordance with LR IA 6-1.

7 The parties respectfully request this extension of time. Throughout the month of  
8 December, Plaintiff's undersigned counsel devoted substantial time and resources to  
9 prepare for oral argument before the Nevada Supreme Court in the matter styled  
10 *Sunrise Hospital and Medical Center, LLC v. Eighth Judicial District Court; Grace,*  
11 NVSC Case No. 85844. Oral argument occurred before the Nevada Supreme Court on  
12 December 19, 2023. In addition, Plaintiff's counsel of record, Dennis M. Prince,  
13 welcomed the birth of his child in December, which also required him to take some time  
14 away from the office. The parties' requested extension of time will allow Plaintiff to  
15 comprehensively and substantively respond to the numerous arguments Defendant sets  
16 forth in its Motion for Summary Judgment.

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1 Based on the foregoing, the parties respectfully request this Court to approve the  
2 foregoing stipulation. The parties' requested extension is not made in bad faith or to  
3 unnecessarily delay these proceedings.

4 DATED this 28th day of December, 2023.

DATED this 28th day of December, 2023.

5 **PRINCE LAW GROUP**

**KEATING LAW GROUP**

6  
7 /s/ Kevin T. Strong

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Attorneys for Defendant

**ORDER**

13 **IT IS SO ORDERED.**

14 DATED December 29, 2023.

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17 UNITED STATES DISTRICT JUDGE  
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